

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 15-cr-10322
	)	
SHANE GUNN	)	

**JOINT MOTION TO CONTINUE SENTENCING HEARING**

Defendant, Shane Gunn, and the United States Government, by and through their respective attorneys, hereby move that the sentencing hearing, now scheduled for March 2, 2016, at 2:30 p.m. be continued to March 31, 2016 at 2:30 p.m.

As reason for this request, the parties state that they have sought unsuccessfully to resolve disputed sentencing matters and that a factual hearing will be necessary to resolve the material matters in dispute. Both counsel will be out of their offices for two weeks between now and the presently scheduled date. The extension requested is to a date and time at which both counsel are available suggested by the Court's Courtroom Clerk. The additional time will enable a better development of the parties' positions and clearer presentation of the facts to the Court at the time of sentencing.

WHEREFORE, the parties respectfully submit that good cause exists to continue this matter and request that this Court continue the sentencing hearing to March 31, 2016 at 2:30p.m.

Carmen M. Ortiz  
U.S. Attorney

/s/ Stephen P. Heymann  
By: Stephen P. Heymann  
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I, Stephen P. Heymann, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on February 4, 2016.

/s/ Stephen P. Heymann